



November 13, 2009

Craig Whitenack, Civil Investigator
U.S. Environmental Protection Agency
Region IX, Southern California Field Office
600 Wilshire Avenue, Suite 1420
Los Angeles, California 90017

Re: CERCLA 104(e) Information Request to Stero Company
Yosemite Creek Superfund Site - San Francisco, California

Dear Mr. Whitenack:

The following is the response of Stero Company (Stero) to the U.S. Environmental Protection Agency (EPA) CERCLA 104(e) Information Request dated October 15, 2009 concerning the Yosemite Creek Superfund Site (Site) in San Francisco, California. Stero is currently a division of Illinois Tool Works Inc. (ITW). The parent company of Stero was acquired by ITW in 1999 and Stero was subsequently merged into ITW.

Due to its very small contribution to the Bay Area Drum Site, Stero entered into a *de minimis* settlement with larger parties in 1995. Stero's contribution would in fact have qualified for a *de micromis* settlement per U.S. EPA CERCLA settlement policy.

Please direct all questions and correspondence regarding this Site to Ken Brown at:

Illinois Tool Works Inc.
3600 West Lake Avenue
Glenview, IL 60026

Phone: (847) 657-4843
Fax: (847) 657-7892
E-mail: kbrown@itw.com

Despite its willingness to work with other PRPs at this Site to resolve this matter with U.S. EPA, ITW does not admit any liability nor does it waive any rights in this matter or possible defenses to liability at the Site.

Sincerely,

A handwritten signature in black ink, appearing to read "Ken Brown", is written over a horizontal line.

Ken Brown, CHMM
Manager of Environmental
and Chemical Compliance

Enclosures

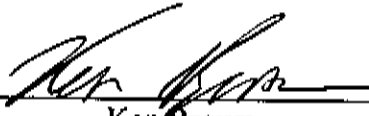
**General objections of Stero
to U.S. EPA Information Request dated October 15, 2009
in regard to the Yosemite Creek Superfund Site**

1. Stero objects to the Information Request to the extent it seeks information contained in documents readily available to U.S. EPA from the files of federal, state and local agencies.
2. Stero objects to the Information Request to the extent that it is unduly burdensome, oppressive, overly broad and unreasonable.
3. Stero objects to the Information Request to the extent it seeks information protected by the attorney-client privilege, the attorney work-product doctrine, or any applicable privilege or rule that protects such information from disclosure.
4. Stero objects to the Information Request to the extent it seeks information that is not calculated to discover information relevant to the Yosemite Creek Site.

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.

Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Ken Brown

Manager of Environmental
and Chemical Compliance
Illinois Tool Works Inc.

11/13/09

Date

RESPONSES TO INFORMATION REQUEST QUESTIONS

1. Stero has manufactured warewashing systems for the commercial food equipment market over the course of its 60 year history. The warewashing systems vary from semi-automatic stationary washing machines to fully automatic conveyor washers. See www.stero.com for more information.
2. According to a 1992 letter from Stero to a special investigator working on behalf of the California Department of Toxic Substances Control (DTSC), the Stero facility at 3200 Lakeville Highway in Petaluma, California shipped eight (8) empty drums to the BAD Site in 1986 for disposal. The 1992 letter and accompanying DTSC correspondence are included as Attachment 2 to these responses. No information regarding shipments to the BAD Site from any other Stero facilities was identified. See response to Question 3 for additional information about Stero facilities and operations over the Relevant Time Period.
3. Description of Stero operations:
 - a. Operations at the Stero facility located at 3200 Lakeville Highway in Petaluma, California began in approximately 1975 and continue at present. Stero previously operated from approximately 1960 through 1974 at a location on Donner Street in San Francisco, California. Operations have been similar at the Petaluma and San Francisco locations ("Facilities"). Stero operated for approximately ten (10) years at two prior locations in the San Francisco area. Addresses were not determined for those locations. Operations at those locations are believed to have been on a much smaller scale than those described below for the Facilities as Stero was a startup company at that time.
 - b. Types of work at the Facilities have included sheet metal work (cutting, bending, grinding and welding), metal machining (drilling, milling and turning), solvent cleaning (wipe and dip methods), assembly and packaging as well as shipping and receiving. Painting has been conducted in a single spray booth at the Facilities. Parts have been wipe-cleaned with lacquer thinner prior to painting.
4. Except for those records provided in response to Question 2 above, no records regarding the storage, production, purchasing and use of Substances of Interest (SOI) during the Relevant Time Period were located after a diligent search of Stero and ITW files.
5. Stero has purchased, used and stored sheet metal, other metal items, metal coatings, and oils at the Facilities that may have contained very low concentrations of lead and zinc. This response is based on a review of representative material safety data sheets (MSDSs) and general knowledge of metal composition.
6. No specific information was identified. See response to Question 5.

7. Items containing very low concentrations of lead and zinc have been present at the Facilities throughout their periods of operation. See response to Question 5.
8. No specific information was identified for the Relevant Time Period but the approximate annual generation of used oils that likely contained very low concentrations of lead and zinc at the Petaluma facility over the last ten (10) years has averaged about two (2) fifty-five (55) gallon drums. Once every few years, machine tool hydraulic oil reservoirs are purged which results in approximately eight (8) drums of used oil. Recyclable metal generation has been between 100,000 and 200,000 pounds per year in recent years (see Attachment 8). Approximately 90% of the recyclable metal is stainless steel. Stero personnel indicated that oil usage and recyclable metal generation in the latter portion of the Relevant Time Period would have been similar.
9. See response to Question 8. Destination facilities for recycling or re-refining used oil have included the following and those listed on Attachment 9 (destination facilities used by Maximum Oil Service):

General Environmental Management
11855 White Rock Road
Rancho Cordova, California

Destination facilities for recyclable metals are described in Attachment 8.

10. Stero has purchased, used and stored hydraulic oil at the Facilities. Any liquid-filled transformers at the Facilities were owned and serviced by others. These responses are based on knowledge of a current Stero employee (Terry Goodfellow).
11. The types of hydraulic oil purchased, used and stored at the Facilities have included Chevron/Enerpac ISO-32 as well as Mobil DTE 24 and 25.
12. The types of hydraulic oil described in the response to Question 12 were purchased, used and stored at the Facilities throughout their periods of operation.
13. No specific information was identified for the Relevant Time Period but the approximate annual usage of hydraulic oil described in the response to Question 11 at the Petaluma facility in recent years has been approximately one (1) fifty-five gallon drum.
14. See response to Question 8.

15. Hydraulic oil is the only significant SOI used at the Facilities.
 - a. Hydraulic oil was used to lubricate machine tools at the Facilities for the entire operating periods of the Facilities.
 - b. Suppliers identified for the hydraulic oil included Chevron, Enerpac and Mobil. No specific documentation of purchases or deliveries was identified for the Relevant Time Period. Annual hydraulic oil usage in recent years has been about one (1) fifty-five gallon drum. Stero personnel indicated that usage in the latter portion of the Relevant Time Period would have been similar.
 - c. Hydraulic was delivered to the Facilities in fifty-five (55) gallon steel drums over the entire operating periods of the Facilities.
 - d. Per the information provided in response to Question 2, no records of empty hydraulic oil drum shipments to off site locations were identified except for the 1986 shipment to the BAD Site. Stero personnel indicated that strict take-back requirements were established with SOI suppliers after Stero was noticed by DTSC about the BAD Site in 1992. In addition, some empty drums were utilized by the Facilities to contain component parts, metal chips, used oil, etc.
16. Hydraulic oil was received in fifty-five (55) gallon drums. Stero was not able to confirm if all of the drums were new and/or re-conditioned but they appeared to be. Stero personnel indicated that they have no reason to believe that the containers were used.
17. See response to Question 15d.
18. See response to Question 15d.
19. See response to Question 15e. Ownership of SHC after the notice by DTSC about the BAD Site in 1992 remained with the suppliers.
20. Individuals with responsibility for procurement of Materials at the Petaluma facility have included the following:

Vince Glaviano, Buyer/Purchasing Agent - November 2002 to present
Paul Brunetta, Purchasing/Safety Manager - June 1976 to June 2002

Stero personnel believe that the two (2) predecessors to Paul Brunetta are now deceased. Information possessed by the incumbent concerning Stero's procurement of Materials would include invoices, shipping papers, etc. that are still within relevant corporate records retention time periods.

21. Used oils have been collected in fifty-five (55) gallon drums for the entire operating periods of the Facilities. Stero personnel indicated that used oil was removed at least once per year. Recyclable metals that may have contained very small concentrations of lead or zinc were collected in fifty-five (55) gallon drums and small open-top skips (dumpsters) at the Facilities. Stero personnel indicated that recyclable metal containers were removed several times a year from the Facilities.
22. As stated in the response to Question 21, fifty-five (55) gallons drums have been used to collect used oil and fifty-five (55) gallon drums and open-top skips (dumpsters) have been used to collect recyclable metals at the Facilities. These containers have been removed from the Facilities when full. Stero personnel were not able to provide identifying colors or markings for the containers since that has varied over the Facility operating periods. Stero personnel indicated that the containers used to collect used oil and recyclable metals were generally used rather than new.
23. Detailed records were not identified for the Relevant Time Period. Recent agreements with Stero's used oil and recyclable metal contractors indicate that the used oil contractor takes title to the material including the container. The recyclable metal contractor owns the open-top skips.
24. Individuals with responsibility for environmental matters at the Facility have included the following:

Paul Brunetta, Purchasing/Safety Manager - June 1976 to June 2002
Terry Goodfellow, Director of Operations - July 1973 to present

Mr. Brunetta reported to Mr. Goodfellow throughout his Stero tenure. Mr. Goodfellow currently reports to Lin Sensenig, Stero General Manager, and has reported to various individuals over the years. No information about predecessors to Mr. Goodfellow was determined. Information possessed by the incumbent concerning Stero environmental matters would include environmental reports, permit information, waste manifests, waste profiles, etc. that are still within relevant corporate records retention time periods.
25. No information was identified about purchases from a drum recycler.
26. No specific information was identified. Stero personnel indicated that wastes were segregated for as long as they could recall.
27. No information was identified.

RESPONSES TO INFORMATION REQUEST QUESTIONS

Page 5 of 5

28. See response to Question 2 for records of communication between Stero and the Bay Area Drum Company. No records of communication between Stero and the other entities listed were identified.
29. No records regarding SOIs are available prior to approximately 2003 except for information available from online sources such as the DTSC and U.S. EPA web sites as well as possibly in the files of those agencies.
30. See Attachments to these responses. Attachments are identified by the number of the Information Request Question they pertain to.

Persons consulted and involved in preparation of these responses were as follows:

Vince Glaviano
Buyer/Purchasing Agent
Stero Company

Terry Goodfellow
Director of Operations
Stero Company

Margaret Lustig
Executive Assistant/HR Specialist
Stero Company

Lin Sensenig
General Manager
Stero Company

Stero address and telephone number:

Stero Company
3200 Lakeville Highway
Petaluma, California 94954
(800) 762-7600

George Goobanoff
George Goobanoff Associates
Environmental, Health & Safety Consultant to Stero (since circa 2003)
218 Burgundy Road
Healdsburg, California 95448
(707) 433-4647

Ken Brown
Manager of Environmental
and Chemical Compliance
Illinois Tool Works Inc. (ITW)
3600 West Lake Avenue
Glenview, Illinois 60026
(847) 724-7500

Last known address for Paul Brunetta:

710 Old King Road
Petaluma, California 94954

Attachment 2

1992 Stero Response to DTSC Special Investigator

Stero

THE STERO COMPANY

May 22, 1992

Bill Motmans
Special Investigator
Office of Local Enforcement
400 P Street, 4th Floor
P.O. Box 806
Sacramento, CA 95812-0806



Dear Mr. Motmans:

In response to our phone conversation and your letter stamped May 12, 1992, in regards to Bay Area Drum Company.

1. To the best of our knowledge we shipped 8 drums through 1987 to BADC. The estimated number of drums for pick-up was 21, but only 8 were actually pick-up.
2. The drums originally came to us new or recondition and filled with either hydraulic oil or lacquer thinner.
3. The drums were 55 gallon steel type.
4. When the hydraulic oil or lacquer thinner were used up, we would use the drums to put our dirty lacquer thinner and waste oil in. When the drums were filled we would have a waste hauler come in and vacuum out all of the waste products (waste no. 214, flammable liquid un1993).
5. When the drums were picked up by BADC they were empty.
6. We would tilt test the drums to see that were completely empty.
7. The drums were sent to BADC for proper disposal.

I hope that the information we have given you is satisfactory. Please don't hesitate to contact me if you have any more questions.

Sincerely,

Paul Brunetta
Safety Coordinator

3200 LAKEVILLE HIGHWAY • PETALUMA, CALIFORNIA 94954 • (707) 762-0071

TOLL FREE 800-762-7600

Mailed 5-22-92

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

400 P Street, 4th Floor

P.O. Box 806

Sacramento, CA 95812-0806



(916) 322-2831

MAY 12 1992

Mr. Paul Brunetta
Safety & Environmental Manager
Stero Company
3200 Lakeville Highway
Petaluma, CA 94954

Dear Mr. Brunetta:

This letter is to confirm our phone conversation of May 11, 1992 regarding Stero Company's past business relationship with the Bay Area Drum Company (BADC) located at 1212 Thomas Avenue, San Francisco.

Please find some receiving tickets attached and other documentation related to some transactions in 1986.

The Department is interested in the nature of transactions between your company and BADC. As previously discussed, the Department is specifically interested in the following:

1. The approximate number of drums shipped to BADC through 1987.
2. The nature of the substances contained in subject drums.
3. The type and capacity of each drum.
4. The disposition of subject drums after the substances were used.
5. The residual level in each drum after they were shipped offsite.
6. Methods used to determine the residual levels in each drum.
7. Were drums sent to the BADC for reconditioning or disposal?

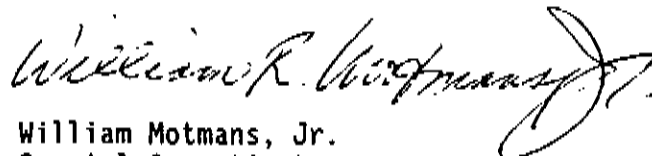
Please provide responses to the aforementioned questions within thirty (30) days of this letter. Compliance with the information request set forth is mandatory pursuant to § 25185.6, 25358.1, and 25358.3 of the California Health and Safety Code.

Please send your response to: Bill Motmans
Special Investigator
Office of Local Enforcement
400 P Street, 4th Floor
P.O. Box 806
Sacramento, CA 95812-0806

Mr. Paul Brunetta
Page 2

I want to thank you for your courtesy and assistance during our conversation today and urge you to contact me if you need further clarification on any of these matters.

Sincerely,


William Motmans, Jr.
Special Investigator

Enclosures

RECEIVING TICKET

BAY AREA DRUM CO., INC.

BUY • SELL • RECONDITION

1212 THOMAS AVENUE • SAN FRANCISCO, CA 94124 • (415) 822-3955

☐ PURCHASED ☐ INVENTORY

Date

2/27/96

115

984

Received from

STERO COMPANY

Address

3200 LAKEVILLE HIGHWAY, PETALUMA

Acct. of:

SEE: PAUL (707) 762-0071

QUANTITY	DESCRIPTION
	55 GAL #1 OIL TOP BUNG
	55 GAL #2 OIL TOP BUNG
	55 GAL DEHEADERS SHORT
	55 GAL DEHEADERS TALL
	55 GAL JUNKERS
	55 GAL FOT. L.L. TALL
	55 GAL FOT. L.L. SHORT
	55 GAL FOT. 17H
	55 GAL FOT. BOLT TALL
	55 GAL FOT. BOLT SHORT
	55 GAL FOT. ADG.
	30 GAL OIL #1
	30 GAL OIL DEHEADERS
	30 GAL FOT. BOLT
	30 GAL FOT. L.L.
21	TOTAL

Charge 2
back for
disposal

Per

PICK UP ON NEXT SANTA ROSA RUN

BAY AREA DRUM CO. Inc.



Drums Bought, Sold and Reconditioned

1212 THOMAS AVENUE SAN FRANCISCO, CA 94124 PHONE: (415) 822-3955
P.O. Box 24228

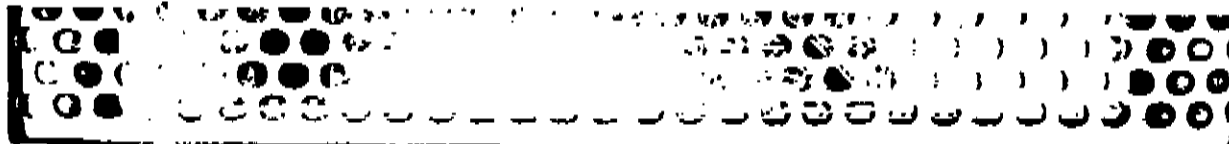
INVOICE

NO 3517

SOLD TO:

The Stern Company
P.O. box 219
Petaluma, Ca 94953

INVOICE DATE 9/15/86	DATE SHIPPED 9/15/86	YOUR ORDER NUMBER 00167	TERMS Net 15 days
QUANTITY	DESCRIPTION		AMOUNT
8	55 Gal Drums, Disposal charge Pick up Tag #0981		\$ 2.00 ea \$ 16.00



Stero

THE STERO COMPANY

00187

THIS NUMBER MUST APPEAR
ON ALL INVOICES AND PACKAGES

P.O. BOX 219 • 3200 LAKEVILLE HIGHWAY • PETALUMA, CALIFORNIA 94953
 (707) 762-0071 800-762-7000 800-732-6565
 LOCAL OUTSIDE CALIFORNIA INSIDE CALIFORNIA

T
O
BAY AREA DRUM CO.
 P.O. BOX 24228
 SAN FRANCISCO, CA 94124

(415) 822-3955

DATE: 8-27-86

SHIP TO: STERO

ROUTE VIA: YOUR TRUCK

DATE REQUIRED:

VENDOR PROMISED DATE:

ORDER GIVEN TO: JACK

JOB	FOR	<input checked="" type="checkbox"/> TAXABLE	<input type="checkbox"/> RESALE PERMIT SRM - 1931678-54	TERMS	F.O.B. POINT
QUANTITY	UNIT OF MEASURE	PART NUMBER	DESCRIPTION	UNIT PRICE	
21			EMPTY 55 GAL DRUMS FOR DISPOSAL ID# CAD 981388564	2.00 EA	

NOTE: FAILURE TO SHIP PER PURCHASE ORDER SCHEDULE COULD RESULT IN CANCELLATION OF PURCHASE ORDER AND/OR DELAYED PAYMENT OF INVOICE. PLEASE SIGN AND RETURN ACKNOWLEDGEMENT COPY.

NOTICE: THIS ORDER IS GIVEN AND ACCEPTED SUBJECT TO ALL THE TERMS, CONDITIONS AND INSTRUCTIONS HEREIN CONTAINED AND PRINTED ON THE REVERSE SIDE HEREOF OR APPENDED HERETO. RENDER INVOICES FOR EACH SHIPMENT AGAINST THIS PURCHASE ORDER. IF PARTIAL SHIPMENTS ARE MADE, PROVIDE PACKING LIST IN EACH SHIPMENT SHOWING CONTENTS AND PURCHASE ORDER NUMBER.

EXECUTE ACCEPTANCE COPY OF THIS ORDER. ANY ACCEPTANCE OF THIS ORDER IS YOUR PROMISE THAT ITEMS WILL BE DELIVERED AT THE TIMES PROVIDED IN, AND UNDER THE TERMS OF, THIS ORDER. NO DEVIATIONS OR AMENDMENTS WILL BE BINDING ON STERO UNLESS ACCEPTED IN WRITING AND SIGNED BY A MANAGER OF PURCHASING OR AN OFFICER OF THE STERO COMPANY. NO OTHER FORM OF ACCEPTANCE IS BINDING ON THE STERO COMPANY.

BY

THE STERO COMPANY

ORIGINAL

DHS-TSCP-SMB-REGION 05-11-92 02:56PM P005 #06

RECEIVING TICKET

BAY AREA DRUM CO., INC.

BUY • SELL • RECONDITION

1212 THOMAS AVENUE • SAN FRANCISCO, CA 94124 • (415) 822-3955

☒ PURCHASED ☐ INVENTORY

Date

8/27/86

No 0984

Received from STERO COMPANYAddress 3200 LAKEVILLE HIGHWAY, PETALUMA

Acct. of:

SEE: PAUL. (707) 762-0071

QUANTITY	DESCRIPTION
	55 GAL. #1 OIL TOP BUNG
	55 GAL. #2 OIL TOP BUNG
	55 GAL. DEHEADERS SHORT
	55 GAL. DEHEADERS TALL
8	55 GAL. JUNKERS
	55 GAL. F.O.T. L.L. TALL
	55 GAL. F.O.T. L.L. SHORT
	65 GAL. F.O.T. 17H
	55 GAL. F.O.T. BOLT TALL
	55 GAL. F.O.T. BOLT SHORT
	65 GAL. F.O.T. ADG.
	30 GAL. OIL #1
	30 GAL. OIL DEHEADERS
	30 GAL. F.O.T. BOLT
	30 GAL. F.O.T. L.L.
8	TOTAL

Per

OPD/OC

PICK UP ON NEXT SANTA ROSA RUN

Attachment 8

2003 to 2008 Recyclable Metal Generation

Stero: Summary of Metal Recycling from 2003 to 2008

2003		2004		2005	
A & P		A & P		A & P	
2248 Minden Way					
Sacramento, CA 95835					
(415) 235-4258					
	lb. weight		lb. weight		lb. weight
#1 Copper	41	Aluminum	2895	Black iron	490
Irony Stainless	573	Black iron	1524	Mixed metal	554
Scrap iron	5515	Black iron/ stainless steel mix	926	Scrap iron	90
Stainless steel	137474	Mixed	104	Stainless steel	74837
Yellow Brass	183	Scrap iron	271	Steel	18
		Stainless steel	93664	Unprepared Scrap	675
Dimond Jatssco		Dimond Jatssco		Dimond Jatssco	
11665 Berryessa Road					
San Jose, CA 95133					
(408) 451-9515					
	lb. weight		lb. weight		lb. weight
Breakage	247				
Cont. Stainless Steel	1348				
Insulated Copper Wire	200				
Stainless steel	61340	Stainless steel	53907	Stainless steel	41862
Steel	5981	Steel	14097	Steel	4887

[illegible]

Attachment 9

Destination Facilities used by Maximum Oil Service

MAXIMUM

OIL SERVICE

1-800-700-4829

Send Payment to:
Maximum Oil Service, LLC
164 Robles Dr. #207
Vallejo, CA 94591

Invoice No.

11800

Date 08/07/03

Name <u>STERO</u>		Bill to <u>STERO</u>			
Address <u>3200 LAUREVILLE HWY</u>		Address			
City <u>Petaluma</u>	State <u>CA</u>	City	State Zip		
Phone <u>707-77-2543</u>	Fax	Phone			
Customer EPA # <u>CA0981388564</u>		Contact <u>George</u>			
DESCRIPTION	WASTE CODE	MANIFEST #	QTY	RATE	AMOUNT
Non RCRA Hazardous Waste, Liquid (Used Oil) <input type="checkbox"/> Industrial <input type="checkbox"/> Lubricating	CA 221		3909.246	95.44	95.44
Non RCRA Hazardous Waste, Liquid (Used Oil and Water)	CA 221				
Non RCRA Hazardous Waste, Liquid (Used Antifreeze)	CA 343				
Transportation					
Tax Pass/Fail					
Drained Used Oil Filters					
PLEASE PAY FROM THIS INVOICE		TERMS: NET 15 DAYS		TOTAL DUE <u>95.44</u>	
A service charge of 1.5% per month shall be charged on past due accounts.		<input checked="" type="checkbox"/> <input type="checkbox"/>		<input type="checkbox"/> <input type="checkbox"/>	
<input type="checkbox"/> Consolidated Manifest		Source: <input type="checkbox"/> Collection Station <input type="checkbox"/> Industrial <input type="checkbox"/> Marine <input type="checkbox"/> Agricultural <input type="checkbox"/> Govt.		PO <u>080703</u> Check #	

TSDF: Some facilities may ship oil out of state for processing and recycling. Please contact the transporter for more information.

Recycling Oil Transfer
1515 So. River Road
W. Sacramento, CA 95601
CAD 044 003 568

Reycle Oil II, Inc.
201 Bay Road
East Palo Alto, CA 94303
CAD 008 482 827

Generator certifies that the above described shipment has not been mixed with any other waste. Furthermore it has established a program to reduce the volume & toxicity of waste generated where economically practicable.

Evergreen Oil
5202 Smith Avenue
Hayward, CA 94505
CAD 880 967 418

Avico Oil
5032 Asher Street
Alhambra, CA 91802
CAD 900 161 743

FRS Inc.
180 W. Morris Ave.
Rialto, CA 92316
CAD 922 444 481

Driver Signature

Generator Signature

Please keep a copy of this invoice in a "Hazardous Waste" file for three (3) years as required by State law.

EPA # CAL00018897 DTSC # 3670 CA12513

Maximum Oil Service Fax 707-945-3804

1-800-608-284X or 1-800-700-4829

Remanded
for H 2003
11/15/03

[Handwritten signature]

[Handwritten signature]